

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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CVS HEALTH CORPORATION AND  
CVS PHARMACY, INC.,

Movants,

v.

THRIFTY DRUG STORES, INC.,

Respondent.

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No.

**MOTION TO COMPEL  
PRODUCTION OF DOCUMENTS  
RESPONSIVE TO RULE 45 SUBPOENA**

Pursuant to Federal Rule of Civil Procedure 45, CVS Pharmacy, Inc. and CVS Health Corporation (“CVS”) moves to compel compliance with Requests 1-5 in a subpoena for documents served upon Thrifty Drug Stores, Inc. (“Thrifty White”) by CVS in the underlying action *Blue Cross & Blue Shield of Alabama v. CVS Pharmacy, Inc.*, Civil Action No. 1:20-cv-00236-WES-PAS (lead case), pending in the United States District Court for the District of Rhode Island, and the related cases.

The place of compliance for the subpoena is Minnesota, and therefore CVS brings this motion in this Court. This motion is based upon the memorandum of law and supporting papers filed contemporaneously herewith, as well as the arguments of counsel and all files, records, and proceedings herein.

Dated: July 26, 2023

Respectfully submitted,

/s/ Samuel M. Johnson

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